

March 10, 2004

Ms. Ellen Caldwell (6WQ)  
Water Quality Protection Division  
U.S. Environmental Protection Agency  
Region 6  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

RE: Comments on TMDL for Bayou LaFourche for Fecal Coliform  
Federal Register Notice February 9, 2004  
Volume 69, No. 26

Dear Ms. Caldwell:

The Louisiana Department of Environmental Quality (LDEQ) has reviewed the TMDL for Bayou LaFourche for fecal coliform noticed in the February 9, 2004 Federal Register (Volume 69, Number 26). This TMDL was prepared by a contractor for Region 6 EPA. LDEQ's comments are presented below.

In general, LDEQ does not believe that the TMDL concept was intended to address fecal coliform bacteria. Bacteria are living organisms and are not suited to mathematical computations to estimate loading. In the aquatic environment, bacteria reproduce and die off at rates that vary as in-stream and climatic conditions vary.

This TMDL indicates that a 47% reduction in the bacteria load from the Mississippi River (pumped water) would be necessary to meet the standard for primary contact recreation in Bayou Lafourche. The pumped water from the Mississippi River was calculated to comprise 88% of the source of fecal coliform in Bayou Lafourche. All other sources were insignificant by comparison. Since the Mississippi River drains over 40% of the conterminous United States, and Bayou Lafourche is a distributary of the Mississippi River, achieving this reduction in bacteria loading would require reductions throughout the Mississippi River watershed all the way up to Minnesota. The EPA does not adequately address how this would be accomplished.

Reducing the loading by reducing the amount of water pumped into Bayou Lafourche would be in direct conflict with the State's planned increase in flow as part of the coastal restoration program, which is supported by EPA. Reduction in flow would also exacerbate saltwater intrusion from the Gulf into Bayou Lafourche, which is a drinking water source for the communities along the Bayou.

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Beginning in January, LDEQ revised its ambient water quality monitoring cycle to a four-year cycle. LDEQ requests that the EPA TMDL reports be revised to reflect this. A description of the revised monitoring approach is attached for EPA use.

If the EPA would like to confer with LDEQ regarding this TMDL, arrangements can be made through Ms. Emelise Cormier or Ms. Barbara Romanowsky.

Sincerely,

Karen Gautreaux, Deputy Secretary  
Louisiana Department of Environmental Quality

Cc: Governor Kathleen Babineaux Blanco  
Sidney Coffee, Office of the Governor  
Len Bahr, Office of the Governor  
Beverly Ethridge, Region 6 EPA, Baton Rouge  
Jane Watson, Region 6 EPA  
Golam Mustafa, Region 6 EPA  
Barbara Romanowsky, LDEQ/EED  
Emelise Cormier, LDEQ/ETD